

EXHIBIT B

From: [Jeffrey L. Haberman](#)
To: [Danninger, Timothy](#); [Jonathan R. Gdanski](#)
Cc: *mguzman@kelloggghansen.com; dschwarz@kelloggghansen.com; rfolio@kelloggghansen.com; [Wilson, Gabrielle](#); [LeMieux, George](#); [Steif, Andrew](#)
Subject: Re: JLI - McKnight - Discovery Letters
Date: Wednesday, May 15, 2024 3:07:11 PM

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Tim,

We do not think we need to correct our letter with the Court. First, you did initially ask for all text messages. Second, the discovery requests you served asked for all communications which would also include text messages. The Court sustained an objection to that request. With this, our letter was accurate.

Thanks,

Jeff



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From: Danninger, Timothy <TDanninger@gunster.com>

Sent: Wednesday, May 15, 2024 11:00 AM

To: Jeffrey L. Haberman <JHaberman@schlesingerlaw.com>; Jonathan R. Gdanski <JGdanski@schlesingerlaw.com>

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Subject: JLI - McKnight - Discovery Letters

Jeff and Jon:

In your May 13, 2024 discovery letter to Judge Orrick, you stated with respect to

JLI's written discovery requests:

Specifically as it related to the discover (sic) JLLI (sic) has indicated thy (sic) would ask for, text messages and similar items, Plaintiff's position is that such discovery has already been produced as part of CMO 17 and that during the course of negotiations between leadership in the MDL an agreement as (sic) reached that the Plaintiff would not request text messages or similar items between the founding and investor Defendants in exchange for similar information not being sought from respective personal injury Plaintiffs.

This an inaccurate statement.

The draft discovery we sent you and eventually included in our discovery letter did not include a request for text messages. On the contrary, we pointed out to you specifically that we removed the request for text messages from the draft discovery.

This inaccuracy to the Court needs to be corrected. Please advise whether you will submit today a correction to your letter clarifying that JLI's proposed discovery does not include text messages. If by 5pm ET today you do not confirm that you will send a correction today, we will file a supplemental discovery letter correcting this issue for the Court.

Let me know if you want to discuss.

Tim

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